

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	CC Docket No. <u>95-116</u>
Telephone Number Portability	)	NSD File No. L-98-54

**REPLY OF SPRINT LOCAL TELEPHONE COMPANIES**

In accordance with the Public Notice issued April 9, 1998, the Sprint Local Telephone Companies ("Sprint") reply to the partial opposition to its waiver request filed by MCI Telecommunications Corporation ("MCI").

MCI objects to Sprint's request for a delay of the requirement to implement local number portability ("LNP") in its Athens, Texas central office based on the company's plan to change-out that office in June of this year. MCI contends that the replacement of a central office switch is not an "extraordinary circumstance" worthy of delaying the LNP Phase II deployment schedule. Instead, MCI charges that any difficulty Sprint has regarding conflicts between its office change-out schedule and LNP implementation is the result of its own poor network planning. In any event, MCI asserts that in its experience, the work involved with a switch replacement is not complicated by the presence of LNP and, therefore, there is no reason for the Commission to consider Sprint's waiver request.

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Prior to addressing MCI's arguments, Sprint notes that, as is the situation in many of its offices, MCI has not indicated even a readiness to test LNP in Sprint's Athens central office. Consequently, even if LNP were available in accordance with the Commission's revised schedule, the service would not be utilized by MCI. In short, MCI will not be harmed by the limited waiver Sprint seeks.

Contrary to MCI's claims, Sprint did attempt to conform its office replacement schedule so it would not conflict with the Commission's LNP deployment schedule. It had originally planned to replace the office in February, but vendor difficulties required rescheduling the change-out until June. Sprint continues to experience technical problems with this particular office replacement and, subsequent to the filing of its waiver request on March 16, Sprint became aware that it would be necessary to delay further the office change-out. Sprint now expects the Athens office to be replaced in early August. Just as it made little sense to implement LNP in an office which would be replaced one month later, it makes little more sense to do so when the change out will take place three months hence. This is particularly the case when, as here, no request to test LNP has been received.

Sprint remains concerned that the simultaneous change out of a central office and implementation of LNP poses serious risks to the provision of service through that office. Accordingly, Sprint respectfully modifies its waiver and,

hereby, seeks permission (a limited waiver) to begin testing of LNP no more than 30 days after the change out of its Athens office, and in no event later than September 30, 1998.

Respectfully submitted,

SPRINT LOCAL TELEPHONE COMPANIES


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April 27, 1998

## CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 27<sup>th</sup> day of April 1998, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Reply of Sprint Local Telephone Companies" in the Matter of Telephone Number Portability, CC Docket No. 95-116, NSD File No. L-98-54, filed this date with the Secretary, Federal Communications Commission, to the persons on the attached service list.

  
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